

October 19, 2016

BY ECF

Honorable Alvin K. Hellerstein, U.S.D.J.  
United States District Court for the Southern District of New York  
500 Pearl Street, Room 1050  
New York, NY 10007

Re: *Zuma Press, Inc. v. Getty Images (US), Inc.*  
Docket No. 1:16-cv-06110-AKH

Dear Judge Hellerstein,

We are counsel for Plaintiff Zuma Press, Inc. ("Zuma") in the above-referenced action.

Pursuant to this Court's Individual Rules of Practice, the parties hereby stipulate and jointly request an extension of time for Zuma to file an amended complaint in lieu of opposing the motion to dismiss filed by Defendant Getty Images (US), Inc. ("Getty Images") on October 13 (Dkts. 15 & 16). The current deadline to file an amended complaint as a matter of right is November 3, 2016; the parties respectfully request that this date be extended to December 2, 2016. This is Zuma's first request for an extension.

In addition, should the Court grant the above-requested extension, the parties stipulate and jointly request that Defendant Getty Images (US), Inc. ("Getty Images") shall have until January 16, 2017 to answer or otherwise respond to the amended complaint. If Getty moves to dismiss, Zuma's opposition shall be due by February 20, 2016, and Getty's Images' reply shall be due by March 9, 2016.

Finally, the parties request that the case management conference scheduled for this Friday, October 21 2016 at 10 a.m., be adjourned.

We thank the Court for its attention to this request.

Respectfully Submitted,

/s/ Richard P. Liebowitz  
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1. Def't's motion to dismiss is denied as moot. (Dominate ECF #15)  
2. Pl. to file an. complaint by 12/2/16.  
3. Opp'n papers by 2/20/17  
4. Reply papers by 3/9/17  
5. Oct. 21, 2016 conf. adjourned to date set by later order.  
10.20.16  
A. Liebowitz